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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: STUBHUB REFUND LITIGATION

Case No. 20-md-2951-HSG

This Document Relates to All Cases

**STIPULATION FOR ENTRY OF  
JOINT PROPOSED INITIAL  
SCHEDULING ORDER;  
ORDER**

(Centralized Actions: No. 4:20-02595 (N.D. Cal.); No. 4:20-03025 (N.D. Cal.); No. 1:20-03508 (S.D.N.Y); and No. 3:20-00319 (W.D. Wis.))

(Tag-along Actions: No. 4:20-04125 (N.D. Cal.); and 3:20-04786 (N.D. Cal.))

WHEREAS, on August 6, 2020, the United States Judicial Panel on Multidistrict Litigation centralized four cases against StubHub, Inc.: *Alcaarez v. StubHub, Inc.*, Case No. 4:20-cv-02595-HSG; *Kopfmann v. StubHub, Inc.*, Case No. 4:20-cv-03025-HSG; *Reynolds v. StubHub, Inc. et al.*, Case No. 1:20-cv-03508-AKH (S.D.N.Y.); and *McMillan v. StubHub, Inc. et al.*, Case No. 3:20-cv-00319-JDP (W.D. Wis.). Dkt. No. 36;

WHEREAS, two tag-along actions are pending in this District: *Wood v. StubHub, Inc.*, Case No. 4:20-cv-04125-YGR; and *Dobner v. StubHub, Inc.*, Case No. 3:20-cv-04786-EMC;

WHEREAS, Plaintiffs in the above-captioned centralized actions (except for *Reynolds*, whose counsel has not responded to requests for input) and tag-along actions (together “Plaintiffs”) and Defendants StubHub, Inc. and Last Minute Transactions, Inc. (“Defendants”), have met and conferred in an effort to submit a joint proposed pre-trial schedule; and

WHEREAS, Plaintiff Kopfmann files this Joint Proposed Initial Scheduling Order with the consent of Defendants and all other Plaintiffs in the centralized actions (except *Reynolds*) and tag-along actions; and

WHEREAS, Defendants further advise this Honorable Court that no summons has been issued, or served, upon Defendants in the *Reynolds* matter filed on May 5, 2020. Accordingly, unless the Court dismisses the *Reynolds* case on its own, Defendants intend to file promptly a motion to dismiss that matter only for failure to comply with Fed. R. Civ. P. 4(m).

THEREFORE, THE PARTIES AGREE AND JOINTLY REQUEST that the Court enter an order setting the following schedule:

- Seven (7) days after the Court enters this initial scheduling Order, Plaintiffs will file any motions for the appointment of Interim Lead Counsel. Leadership briefs shall not exceed ten (10) pages (exclusive of firm resumes, which may be attached), and no opposition briefs shall be permitted.
- After the appointment of Interim Lead Counsel, the parties shall meet and confer regarding an initial schedule covering Plaintiffs’ Consolidated Amended Complaint, Defendants’

1 response(s), and any resulting briefing, as well as the exchange of initial disclosures and  
2 holding the Fed. R. Civ. P. 26(f) conference, and shall submit that proposed joint schedule  
3 or competing schedules to the Court no later than seven (7) days after the appointment of  
4 Interim Lead Counsel.

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6 IT IS SO STIPULATED.

7  
8 Dated: August 12, 2020

Respectfully submitted,

9 **GIBBS LAW GROUP LLP**

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20 *and the Proposed Class*

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16 *Minute Transactions, Inc.*  
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WHEREAS, Plaintiffs in the above-captioned centralized actions (except for *Reynolds*, whose counsel has not responded to requests for input) and tag-along actions (together “Plaintiffs”) and Defendants StubHub, Inc. and Last Minute Transactions, Inc. (“Defendants”), have met and conferred in an effort to submit a joint proposed pre-trial schedule; and

WHEREAS, Plaintiff Kopfmann files this Joint Proposed Initial Scheduling Order with the consent of Defendants and all other Plaintiffs in the centralized actions (except *Reynolds*) and tag-along actions; and

WHEREAS, Defendants further advise this Honorable Court that no summons has been issued, or served, upon Defendants in the *Reynolds* matter filed on May 5, 2020. Accordingly, unless the Court dismisses the *Reynolds* case on its own, Defendants intend to file promptly a motion to dismiss that matter only for failure to comply with Fed. R. Civ. P. 4(m).

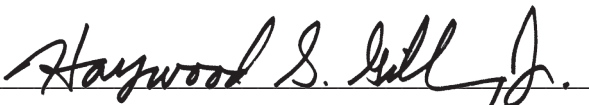
The parties agree and jointly request that the Court enter an order setting the following schedule:

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2 holding the Fed. R. Civ. P. 26(f) conference, and shall submit that proposed joint schedule  
3 or competing schedules to the Court no later than seven (7) days after the appointment of  
4 Interim Lead Counsel.

5  
6 PURSUANT TO STIPULATION, IT IS SO ORDERED.

7  
8 Dated: 8/13/2020

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HONORABLE HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE